

STEVEN G. KALAR
Federal Public Defender
GRAHAM ARCHER
Assistant Federal Public Defender
55 S. Market St., Suite 820
San Jose, CA 95113
Telephone: (408) 291-7753
Graham_Archer@fd.org

Counsel for Defendant, DOUGLAS STORMS YORK

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. 15-00226 EJD
)	
Plaintiff,)	DEFENDANT DOUGLAS STORMS
)	YORK'S AMENDED PROPOSED
v.)	VERDICT FORM
)	
)	Pretrial Conf.: August 24, 2015
DOUGLAS STORMS YORK,)	
)	Time: 10:00 a.m.
Defendant.)	Trial Date: August 25, 2015

Defendant Douglas Storms York submits the amended proposed verdict form attached as Exhibit A.

Dated: August 14, 2015

Respectfully submitted,

STEVEN G. KALAR
Federal Public Defender

/s/ Graham Archer

GRAHAM ARCHER
Assistant Federal Public Defender

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 15-00226 EJD
)	
Plaintiff,)	VERDICT
)	
v.)	
)	
DOUGLAS STORMS YORK,)	
)	
Defendant.)	
_____)	

COUNT ONE: 18 U.S.C. § 912 – False Impersonation of An Employee of the United States

1) Did the government prove beyond a reasonable doubt that Mr. York falsely assumed and pretended to be an employee acting under the authority of the United States Internal Revenue Service?

_____ NO

_____ YES (proceed to question two)

1 2) Did the government prove beyond a reasonable doubt that Mr. York acted in such a
2 manner as an employee of the United States Internal Revenue Service, by falsely stating he
3 was an Agent of the Internal Revenue Service engaged in investigating tax records?
4

5 _____ NO

6 _____ YES (proceed to question three)
7

8 3) Did the government prove beyond a reasonable doubt that Mr. York acted with the intent
9 to defraud?

10 _____ NO

11 _____ YES
12

13 If you answered “No” to questions one, two or three, you must find Mr. York Not Guilty of
14 the offense as charged in Count One.
15

16
17 **COUNT TWO: 47 U.S.C § 223(a)(1)(C) – Telecommunications Device Harassment**

18 1) Did the government prove beyond a reasonable doubt that Mr. York did not disclose his
19 identity?

20 _____ NO

21 _____ YES (proceed to question two)
22

23 2) Did the government prove beyond a reasonable doubt that Mr. York acted with the intent
24 to abuse, threaten and harass a specific person?

25 _____ NO

26 _____ YES (proceed to question three)

1 3) Did the government prove beyond a reasonable doubt that Mr. York used a
2 telecommunications device that moved through interstate and foreign communications?

3 _____ NO

4 _____ YES

5
6
7 If you answered “No” to questions one, two or three, you must find Mr. York Not Guilty of
8 the offense as charged in Count Two.

9
10
11 Therefore, we the jury in the above-captioned case, unanimously find the Defendant, Douglas
12 Storms York:

13
14 _____, (*Not Guilty or Guilty*) of False Impersonation of a Federal
15 Employee, in violation of 18 U.S.C. § 912.

16
17 _____, (*Not Guilty or Guilty*) of Telecommunications Device
18 Harassment, in violation of 47 U.S.C. § 223(a)(1)(C).

19
20
21 Dated: _____, 2015

22 _____
JURY FOREPERSON